

EXHIBIT A

Subject: Tang v. Medical Recovery

Date: Wednesday, July 13, 2011 3:06 PM

From: Curtis Warner <cwarner@warnerlawllc.com>

To: James Vlahakis <jvlahakis@hinshawlaw.com>

Mr. Vlahakis,

Attached please find a proposed protective order in this matter. Because the information sought by Plaintiff's discovery covers Personal Health Information I believe that a protective order is needed for its disclosure. Therefore, please review the proposed protective order and email me any proposed revisions that you may have. I would like to get a protective order in place as soon as possible to avoid any delay in the production of discovery.

Regards,

Curtis Warner

[Curtis C. Warner cwarner@warnerlawllc.com](mailto:cwarner@warnerlawllc.com)

Warner Law Firm, LLC

Millennium Park Plaza

155 N. Michigan Ave. Ste. 560

Chicago, Illinois 60601

312.238.9820 (TEL)

312.638.9139 (FAX)

www.warnerlawllc.com

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EXHIBIT B

Subject: Tang v. Medical Recovery

Date: Wednesday, August 3, 2011 12:08 PM

From: Curtis Warner <cwarner@warnerlawllc.com>

To: James Vlahakis <jvlahakis@hinshawlaw.com>, "'David M. Schultz'" <dschultz@hinshawlaw.com>

Mr. Vlahakis,

On July 13, 2011, I sent you a proposed protective order in this matter. You have not responded. I would like to have on file this week a motion for a protective order so as to have it up for our next court appearance. I do not want Defendant to be able to assert the lack of a protective order as a basis from withholding discovery. I am attaching another copy here. Please review and respond. Please do not put Plaintiff in a position where it is necessary to file a motion to bar an objection based on the lack of a protective order.

Regards,

Curtis Warner

[Curtis C. Warner cwarner@warnerlawllc.com](mailto:cwarner@warnerlawllc.com)

Warner Law Firm, LLC

Millennium Park Plaza

155 N. Michigan Ave. Ste. 560

Chicago, Illinois 60601

312.238.9820 (TEL)

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EXHIBIT C

Subject: Re: Tang v. Medical Recovery

Date: Tuesday, August 9, 2011 4:14 PM

From: jvlahakis@hinshawlaw.com

To: Curtis Warner <cwarner@warnerlawllc.com>

Thank you very much Curtis.

James C. Vlahakis
Hinshaw & Culbertson, LLP
222 N. LaSalle, Suite 300
Chicago, IL 60601
312-704-3715
312-704-3001 [fax]

Curtis Warner <cwarner@warnerlawllc.com> wrote on 08/09/2011 04:01:59 PM:

> Defendant's responses to discover including requests for admission
> shall be due in two weeks that being August 23, 2011.
>
> Sent from my iPhone
> Curtis Warner
>
>
> On Aug 9, 2011, at 1:11 PM, jvlahakis@hinshawlaw.com wrote:

>
> Curtis.
>
> I've reviewed your draft Form 52 Report in this case. Your draft is
> acceptable. Would you like me to file it for us?
>
> I'm going to review your draft protective order later this
afternoon.
>
> In the meantime, I'm still pretty backed up with work on my various
> cases and I'm trying to take off of work early to spend some quality
> time with my parents who are visiting this week from Michigan.
> Would you be so kind as to give me an additional two weeks to
> respond to discovery in this case?

>
> Thanks,
>
> -James
>
> _____
>
> James C. Vlahakis
> Hinshaw & Culbertson, LLP
> 222 N. LaSalle, Suite 300
> Chicago, IL 60601
> 312-704-3715
> 312-704-3001 [fax]
>

>
> Curtis Warner <cwarner@warnerlawllc.com>
> 08/05/2011 04:40 PM
>
> To
>
> <jvlahakis@hinshawlaw.com>
>
> cc
>
> Subject
>
> Re: Tang v. Medical Recovery
>
>
>
>
> No problem, I just recorded the time spent for it. Have a good
weekend.
>
>
> Regards,
>
> Curtis Warner
> - - - - -
> Curtis C. Warner cwarner@warnerlawllc.com
> Warner Law Firm, LLC
> Millennium Park Plaza

> 155 N. Michigan Ave. Ste. 560
> Chicago, Illinois 60601
> 312.238.9820 (TEL)
> 312.638.9139 (FAX)
> www.warnerlawllc.com
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>
>
>

> On 8/5/11 4:35 PM, "jvlahakis@hinshawlaw.com"
<jvlahakis@hinshawlaw.com
> > wrote:
>
>
>

> Curtis.
>

> An earlier meeting ran too long and I must have just missed you.
> I've been w/o my trusted "smart" phone for almost all of the day (I
> was unable to send or receive messages, or make calls while on route
> to let you know I was running late). I'm just catching up on emails
> at the office.
>

> Please accept my apologies. I feel bad that you missed on the golf
> outing. In the future, don't hesitate to ask to move something for
> a family event. Of course, if you had tried to contact me earlier
> in the day, it would have been fruitless as my phone is dead.
>

> I'll send revisions to the report on Monday.
>

> Have a good weekend.

> _____
>
> James C. Vlahakis
> Hinshaw & Culbertson, LLP
> 222 N. LaSalle, Suite 300
> Chicago, IL 60601
> 312-704-3715
> 312-704-3001 [fax]
>
>
> Curtis Warner <cwarner@warnerlawllc.com> 08/05/2011 04:26 PM
> To
> James Vlahakis <jvlahakis@hinshawlaw.com>, "David M. Schultz" <
> dschultz@hinshawlaw.com>
> cc
> Subject
> Re: Tang v. Medical Recovery
>
>
>
>
> Mr. Vlahakis,
>
> Per the court's instruction to meet and confer on this matter, I
> went to the Starbucks of 35 W. Wacker to which you agreed to meet me
> at today at the time you suggested, to hold another meeting to
> prepare the joint status report. I waited for 15 minutes however
> you did not attend. I even kept this appointment even though I
> thought of canceling it after my father-in-law invited me to a round
> of golf with a 2:30 tee-time.
>
> Attached is the proposed Form 52. Please make any revisions you may
> have and return them to me.
>
> Regards,
>
> Curtis Warner
> - - - - -
> Curtis C. Warner cwarner@warnerlawllc.com
<cwarner@warnerlawllc.com>
> Warner Law Firm, LLC
> Millennium Park Plaza

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> and cannot be used, by you (or any other taxpayer) to avoid
> penalties under the Internal Revenue Code of 1986, as amended.
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>
>
>

> On 8/2/11 3:26 PM, "Curtis Warner" <cwarner@warnerlawllc.com <
> cwarner@warnerlawllc.com> > wrote:
>

> 35 W Wacker, the Leo B. building, entrance is off of Lake between
> State and Dearborn.
>
>

> Regards,
>

> Curtis Warner
> - - - - -

> Curtis C. Warner cwarner@warnerlawllc.com
<cwarner@warnerlawllc.com>

> Warner Law Firm, LLC
> Millennium Park Plaza
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>

>

>

>

> On 8/2/11 3:07 PM, "jvvlahakis@hinshawlaw.com

<jvvlahakis@hinshawlaw.com> " <

> jvvlahakis@hinshawlaw.com <jvvlahakis@hinshawlaw.com> > wrote:

>

>

> Great, how about 3pm. Which Starbucks do you propose?

>

>

> -James

>

>

> James C. Vlahakis

> Hinshaw & Culbertson, LLP

> 222 N. LaSalle, Suite 300

> Chicago, IL 60601

> 312-704-3715

> 312-704-3001 [fax]

>

>

> Curtis Warner <cwarner@warnerlawllc.com <cwarner@warnerlawllc.com> >

> 08/02/2011 03:05 PM

> To

> <jvvlahakis@hinshawlaw.com <jvvlahakis@hinshawlaw.com> >

> cc

> Subject

> Re: Tang v. Medical Recovery

>

>
>
>
> I have Friday Aug. 5, after 1:30 but before 4:30 p.m. Available.
>
>
> Regards,
>
> Curtis Warner
> - - - - -
> Curtis C. Warner cwarner@warnerlawllc.com
<cwarner@warnerlawllc.com> <
> cwarner@warnerlawllc.com <cwarner@warnerlawllc.com> >
> Warner Law Firm, LLC
> Millennium Park Plaza
> 155 N. Michigan Ave. Ste. 560
> Chicago, Illinois 60601
> 312.238.9820 (TEL)
> 312.638.9139 (FAX)
> www.warnerlawllc.com
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>
>
> On 8/2/11 3:00 PM, "jvlahakis@hinshawlaw.com
<jvlahakis@hinshawlaw.com> <
> jvlahakis@hinshawlaw.com <jvlahakis@hinshawlaw.com> > " <
> jvlahakis@hinshawlaw.com <jvlahakis@hinshawlaw.com>
<jvlahakis@hinshawlaw.com<
> jvlahakis@hinshawlaw.com> > > wrote:
>

>
> Curtis,
>
> I might be out of town on those two dates for depositions. I'll
> know more in the next day or two regarding whether I am going to be
> out of town.
>
> That said, I'm fine meeting at a Starbucks if I'm free one of those
> dates. Do you have any other dates open?
>
> -James
> _____
>
> James C. Vlahakis
> Hinshaw & Culbertson, LLP
> 222 N. LaSalle, Suite 300
> Chicago, IL 60601
> 312-704-3715
> 312-704-3001 [fax]
>
>
> Curtis Warner <cwarner@warnerlawllc.com <cwarner@warnerlawllc.com> <
> cwarner@warnerlawllc.com <cwarner@warnerlawllc.com> > > 08/02/2011
11:46 AM
> To
> James Vlahakis <jvlahakis@hinshawlaw.com <jvlahakis@hinshawlaw.com>
<
> jvlahakis@hinshawlaw.com <jvlahakis@hinshawlaw.com> > >
> cc
> Subject
> Tang v. Medical Recovery
>
>
>
>
> Mr. Vlahakis,
>
> I am out of state next week on a case but will be available on
> Wednesday, August 10, 2011 after 11:00 a.m. Until 4:00 p.m., and
> will be available on Thursday, August 11, 2011 from 8:30 to 10:00 a.
> m. I propose a meeting point between our offices such as the
> Starbucks, Dunkin Donuts, or Potbelly's on Lake between State and

> Dearborn to conduct the meeting for the Rule 52 joint status report.
> Please advise.
>
>
> Regards,
>
> Curtis Warner
> - - - - -
> Curtis C. Warner cwarner@warnerlawllc.com
<cwarner@warnerlawllc.com> <
> cwarner@warnerlawllc.com <cwarner@warnerlawllc.com> > <
> cwarner@warnerlawllc.com <cwarner@warnerlawllc.com>
<cwarner@warnerlawllc.com<
> cwarner@warnerlawllc.com> > >
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>
>
> [attachment "8.5 Joint Status.doc" deleted by James Vlahakis/HC01]